

THORPE SHWER, P.C.

William L. Thorpe (Arizona Bar No. 005641), *Pro Hac Vice*
 Thomas D. Ulreich-Power (Arizona Bar No. 019345), *Pro Hac Vice*
 3200 North Central Avenue, Suite 1560
 Phoenix, Arizona 85012-2441
 Telephone: (602) 682-6100
 Email: docket@thorpeshwer.com
 Email: wthorpe@thorpeshwer.com
 Email: tulreich-power@thorpeshwer.com

MESSNER REEVES LLP

Renee Finch (Nevada Bar No. 13118)
 5556 S. Fort Apache Road, Suite 100
 Las Vegas, Nevada 89148
 Telephone: (702) 363-5100
 Facsimile: (702) 363-5101
 Email: rfinch@messner.com

*Attorneys for Defendant JB Hunt Transport, Inc.
 and Stephen Palacios*

**UNITED STATES DISTRICT COURT
 DISTRICT OF NEVADA**

JULIO CHIQUIN, an individual;
 JOAQUINA CHIQUIN, an individual;
 JUAN CARLOS DE PAZ-OCHOA, an
 individual; NINFA X. MAAS, an
 individual; NINFA X. MAAS, on behalf
 her minor child, J.D.P.,

Plaintiff,

v.

J.B. HUNT TRANSPORT, INC., a foreign
 corporation; STEPHEN R. PALACIOS, an
 individual; DOES I-X, inclusive, and ROE
 CORPORATIONS I-X, inclusive,

Defendants.

2:21-cv-02119-JAD-DJA

**STIPULATION AND ORDER RE:
 CASE DEADLINES**

(Fifth Request)

ECF Nos. 12, 23

On January 20, 2022, the parties notified this Honorable Court that they reached an agreement for global settlement of this matter [Document 17]. Subsequently, this Court entered an Order on January 24, 2022 extending the deadline to file the opposition to the motion to remand until March 21, 2022, and requiring the parties to file a stipulated dismissal by March 21, 2022 [Document 18]. Due to delays in obtaining the approval for disbursement of

THORPE SHWER, P.C.

1 settlement funds to the minor plaintiff, the parties filed two additional stipulated requests to
 2 extend all deadlines [Document 19 and 21]. This Court granted those requests on March 22,
 3 2022 [Document 20] and June 29, 2022 [Document 22]. The parties are continuing to engage
 4 in good-faith efforts to finalize the settlement and are still in the process of doing so. The
 5 parties agree that an additional 90 days is needed to finalize settlement.

6 On September 2, 2022, Plaintiff's counsel received an order from the court, approving
 7 the amended petition for the minor plaintiff's compromise. The parties are circulating
 8 settlement releases, and once signed, a stipulation and order for dismissal with prejudice will
 9 be filed.

10 Pursuant to LR IA 6-1, the parties are requesting that all pending case deadlines,
 11 including the response to the Motion to Remand filed by Plaintiffs on December 23, 2021, be
 12 extended by 90 days to be due on or before December 21, 2022. This is the Parties fourth
 13 request to extend all case deadlines, and the fifth request to extend time to file Defendants'
 14 Opposition to the Motion for Remand. This Stipulation is made in good faith with the intention
 15 of conserving time and resources of the parties and the Court, pending the finalization of the
 16 settlement agreement.

17 Dated: September 21, 2022
 18 **JENNINGS & FULTON, LTD.**

Dated: September 21, 2022
THORPE SHWER, P.C.

19 By: Adam R. Fulton, Esq. (with permission)
 20 ADAM R. FULTON, ESQ.
 Nevada Bar No. 11572
 Email: afulton@jfnvlaw.com
 21 LOGAN G. WILSON, ESQ.
 Nevada Bar No.: 14967
 E-mail: logan@jfnvlaw.com
 22 2580 Sorrell Street
 Las Vegas, Nevada 89146
 Telephone No.: (702) 979-3565
 Facsimile: (702) 362-2060
 24 *Attorneys for Plaintiffs*

By /s/ William L. Thorpe
 WILLIAM L. THORPE, ESQ.*
 Arizona Bar No.: 005641
 Email: wthorpe@thorpeshwer.com
 THOMAS D. ULREICH-POWER, ESQ.*
 Arizona Bar No. 019345
Tulreich-power@thorpeshwer.com
 3200 N. Central Ave., Suite 1560
 Phoenix, Arizona 85012
 Telephone No.: (602) 682-6100
 *Admitted *pro hac vice*

ORDER

25 Because the finalization of the settlement of this matter is imminent, and to preserve the resources of the
 26 parties and the court, this stipulation [ECF No. 23] is GRANTED in part. **All case deadlines will be tolled**
 27 **until December 21, 2022**, but instead of further extending the deadline to respond to the motion to remand,
 28 that motion [ECF No. 12] is **DENIED without prejudice to its refiling** by December 31, 2022, in the event
 that the settlement of this case is not completed.